COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE
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Doug Domenech
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Director

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Regional Director

STATEMENT OF LEGAL AND FACTUAL BASIS

Metro Machine Corp DBA
General Dynamics NASSCO-Norfolk
200 Ligon Street, Norfolk, Virginia 23501
Permit No. (TRO-60134)

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, [permittee name] has applied for a Title V Operating Permit for its [location-city] facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer: _____ Date: _____
Laura D. Corl
(757) 518-2178

Air Permit Manager: _____ Date: _____
Troy D. Breathwaite

Regional Director: _____ Date: _____
Maria R. Nold

I. FACILITY INFORMATION

Permittee
Metro Machine Corp DBA
General Dynamics NASSCO-Norfolk
P.O. Box 1860
Norfolk, Virginia 23501

Responsible Official
Dave Baker
General Manager

Facility
Metro Machine Corp DBA
General Dynamics NASSCO-Norfolk
200 Ligon Street
Norfolk, Virginia 23523

Contact Person
Dawn Kriz
Environmental Manager
(757) 494-0413

County-Plant Identification Number: 51-710-00034

Facility Description: NAICS 336611 – Ship Building and Repairing

This facility is engaged in activities related to ship building and repair. These activities include abrasive blasting, applying marine coatings, electroplating, woodworking, paint mixing, and degreasing. The facility also includes boilers producing steam for use onboard vessels while docked, generators, compressors, fire pumps, cranes, portable welders, portable heaters and forklifts. Other processes include air conditioner maintenance, use of adhesives, storage tanks and containers, gasoline and diesel fuel loading pumps, and an oil/water separator and treatment system.

This facility is a major source of PM and HAPs. This source is located in an attainment area for all pollutants. The facility currently has three minor NSR permits: one was issued on August 1, 1984, and amended on April 23, 1986; another was issued on January 3, 1986; and the third was issued on June 26, 2002. The source is also subject to the Shipyard MACT, 40 CFR Part 63, Subpart II.

II. COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

III. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	Pollutant Controlled	Applicable Permit Date
Boiler Operations						
1	1	Kewanee boiler H35-750-G02 (natural gas / distillate oil) (1984)	32.0 mmBtu/hr	-	-	8/1/1984, amended 4/23/1986
2	2	Kewanee boiler H3S500-G (natural gas / distillate oil) (1986)	20.9 mmBtu/hr	-	-	1/3/1986
Internal Combustion Engines Operations						
4	4	Caterpillar Model 35086 DITA, 8 cylinder, 4cycle, turbocharged, diesel generator (installed 2000)	1,087.8 HP	-	-	-
98	98	#1 Caterpillar, Model D3516B, 16 cylinders, 4 cycle, turbocharged, diesel generator (2002)	2,514 HP	-	-	6/26/2002
99	99	#2 Caterpillar Model D3516B, 16 cylinders, 4 cycle, turbocharged, diesel generator (2002)	2,514 HP	-	-	6/26/2002
Dry Dock Abrasive Blasting and Painting Operations						
10	-	Dry dock abrasive blasting of ship underwater hull and freeboard surfaces (constructed 1982)	1,000 square foot/hour (8 operators)	containment screens	PM/PM_{10}	-
21	-	Pier side interior / top side hand roll / brush and airless spray painting (constructed 1971)	7 gallons/hour (2 painters)	containment screens when airless spray guns are used	PM/PM_{10}	-
22	-	Outside machine shop hand roll / brush touch-up painting (constructed 1971)	3 gallons/hour (2 painters)	-	-	-

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	Pollutant Controlled	Applicable Permit Date
23	-	Paint shop priming – 60% hand roll / brush and 40% airless spray (constructed 1971)	7 gallons/hour (2 painters)	-	-	-
28	-	SPEEDE Dry dock painting (constructed 2002)	98 gallons/hour (16 painters)	containment screens when airless spray guns are used	PM/PM_{10}	6/26/2002
Degreaser Operations						
24	-	Maintenance shop degreaser (constructed 1990)	20 gallons	cover for degreaser and 15-second parts draining	VOC	-
25	-	Outside machine shop degreasers (2) (constructed 1990)	40 gallons, each	cover for degreaser and 15-second parts draining	VOC	-
27	-	Inside machine shop degreasers (2) (constructed 1990)	20 and 40 gallons	cover for degreaser and 15-second parts draining	VOC	-

IV. EMISSIONS INVENTORY

A copy of the 2011 emission inventory is attached. Emissions are summarized in the following table.

2011 Actual Emissions

	2011 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO_2	PM_{10}	NO_x
Facility Totals	13.9	2.1	0.02	25.3	2.8

V. BOILER OPERATION REQUIREMENTS - (Units #1 and #2)

A. Limitations

The following federal regulation is applicable to the boilers at this facility:

40 CFR 63, Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Source: Industrial, Commercial, and Institutional Boilers and Process Heaters

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5 Chapter 20	General Provisions
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 80	Permits for Stationary Sources

The following minor NSR conditions from the permit issued 8/1/84, and amended on 4/23/86, are applicable requirements for the Title V permit:

NSR Part I Condition 4: Fuel Throughput Limit
NSR Part I Condition 5: Emission Limits
NSR Part I Condition 6: Fuel Requirements – This condition was modified to include the restrictions of burning No. 2 fuel oil now that the boiler MACT has been promulgated.

The following minor NSR conditions from the permit issued 1/3/86, are applicable requirements for the Title V permit:

NSR Part I Condition 4: Fuel Throughput Limit – This condition has been changed to list the natural gas throughput first because the facility fires natural gas as its primary fuel with No. 2 Fuel oil being a back-up/emergency fuel.
NSR Part I Condition 5: Emission Limits
NSR Part I Condition 6: Fuel Requirements – This condition was modified to include the restrictions of burning No. 2 fuel oil now that the boiler MACT has been promulgated.

Visible emission limits have been added for the boilers from the New and Modified Source Chapter, 9 VAC 5-50-80. There are no conditions listed in the permit relating to the Boiler MACT because the two boilers are classified as 'existing large gaseous fuel' boilers. 63.7506(b) says they are only subject to the notification requirements of the MACT and they have already complied with this requirement.

B. Monitoring

No specific monitoring or reporting requirements are listed in the underlying NSR permits for these boilers. A monitoring condition has been added to require the source to monitor the visible emissions from each boiler. The most recent language has been included in this condition.

No periodic monitoring has been required to prove compliance with the emission limits. The following calculations demonstrates that it is unlikely that the units exceed their emission limits:

Unit #1- Distillate fired
Emission Unit Size = 32.0 mmBtu/hr
Heating Value of Distillate Fuel = 138,000 Btu/gal
Sulfur Content of Fuel = 0.5%
Fuel Throughput = 710,000 gallons
Hourly Throughput = (32.0 mmBtu/hr)/(138,000 Btu/gal) = 231.9 gal/hr

Emission Factors from AP42 (Fuel Oil Combustion, 5/10) for distillate fuel

SO_2 142S lb/1000 gal
PM_{10} 1.00 lb/1000 gal

SO_2 emissions:
(((142) x (0.5) / 1000) lb/gal) x (231.9 gal/hr) = ***16.5 lb/hr SO_2***
Title V permitted rate = ***19.1 lb/hr SO_2***

(((142) x (0.5) / 1000) lb/gal) x (710,000 gal/yr) / (2000 lb/ton) = ***25.2 tons/yr SO_2***
Title V permitted rate = ***30.2 tons/yr SO_2***

(16.5 lb/hr SO_2) / (32.0 mmBtu/hr) = ***0.5 lb/mmBtu***
Title V permitted rate = ***0.6 lb/mmBtu***

PM_{10} emissions:
((1.00) / (1000) lb/gal) x (231.9 gal/hr) = ***0.2 lb/hr PM***
Title V permitted rate = ***0.5 lb/hr PM***

((1.00) / (1000) lb/gal) x (710,000 gal/hr) / (2000 lb/ton) = ***0.36 ton/yr PM combined***
Title V permitted rate = ***0.8 ton/yr PM combined***

(0.2 lb/hr PM) / (32.0 mmBtu/hr) = ***0.006 lb/mmBtu***
Title V permitted rate = ***0.02 lb/mmBtu***

Unit #1- Natural Gas fired

Emission Unit Size = 32.0 mmBtu/hr
Heating Value of Natural Gas = 1000 Btu/scf
Fuel Throughput = 95,000,000 scf
Hourly Throughput = (32.0 mmBtu/hr)/(0.001 mmBtu/scf) = 32,000 scf/hr = 0.032 mmscf/hr

Emission Factors from AP42 (Natural Gas Combustion, 7/98) for natural gas.

SO_2 0.6 lb/mmscf
PM_{10} 7.6 lb/mmscf

SO_2 emissions:
(0.6 lb/mmscf) x (0.032 mmscf/hr) = ***0.019 lb/hr SO_2***
Title V permitted rate = ***12.7 lb/hr SO_2***

(0.6 lb/mmscf) x (95 mmscf/yr) / (2000 lb/ton) = ***0.028 tons/yr SO_2***
Title V permitted rate = ***30.2 tons/yr SO_2***

(0.019 lb/hr SO_2) / (32.0 mmBtu/hr) = ***0.0006 lb/mmBtu***
Title V permitted rate = ***0.6 lb/mmBtu***

PM_{10} emissions:
(7.6 lb/mmscf) x (0.032 mmscf/hr) = ***0.24 lb/hr PM***

Title V permitted rate = ***0.5 lb/hr PM***

(7.6 lb/mmscf)x (95 mmscf/yr) / (2000 lb/ton) = ***0.36 ton/yr PM combined***
Title V permitted rate = ***0.8 ton/yr PM combined***

(0.2 lb/hr PM) / (32.0 mmBtu/hr) = ***0.007 lb/mmBtu***
Title V permitted rate = ***0.02 lb/mmBtu***

Unit #2- Distillate Fired

Emission Unit Size = 20.9 mmBtu/hr
Heating Value of Distillate Fuel = 138,000 Btu/gal
Sulfur Content of Fuel = 0.5%
Fuel Throughput = 1,200,000 gallons
Hourly Throughput = (20.9 mmBtu/hr)/(138,000 Btu/gal) = 151.4 gal/hr

Emission Factors from AP42 (Fuel Oil Combustion, 9/98) for distillate fuel

SO_2	142S lb/1000 gal
PM_{10}	1.00 lb/1000 gal

SO_2 emissions:

(((142) x (0.5) / 1000) lb/gal) x (151.4 gal/hr) = ***10.7 lb/hr SO_2***
Title V permitted rate = ***12.7 lb/hr SO_2***

(((142) x (0.5) / 1000) lb/gal) x (1,200,000 gal/yr) / (2000 lb/ton) = ***42.6 tons/yr SO_2***
Title V permitted rate = ***42.6 tons/yr SO_2***

(10.7 lb/hr SO_2) / (20.9 mmBtu/hr) = ***0.5 lb/mmBtu***
Title V permitted rate = ***0.6 lb/mmBtu***

PM_{10} emissions:

((1.00) / (1000) lb/gal) x (151.4 gal/hr) = ***0.15 lb/hr PM_{10}***
Title V permitted rate = ***0.4 lb/hr PM_{10}***

((1.00) / (1000) lb/gal) x (1,200,000 gal/hr) / (2000 lb/ton) = ***0.6 ton/yr PM_{10}***
Title V permitted rate = ***1.2 ton/yr PM_{10}***

(0.6 lb/hr PM) / (20.9 mmBtu/hr) = ***0.03 lb/mmBtu***
Title V permitted rate = ***0.1 lb/mmBtu***

Based on these demonstrations, it appears there is not a great likelihood that the emission limits will be exceeded, and no additional periodic monitoring other than opacity has been required for this unit.

In addition, the throughput of natural gas equivalent to the permitted throughput of distillate oil was determined by calculating the lb/mmBtu value for each fuel. Based on the limiting values, the throughput of natural gas equivalent to 1,200,000 gallons per year of distillate fuel was determined to be 167 million cubic feet per year.

A calculation was added to the fuel throughput condition to allow the facility more flexibility in firing different fuels.

Unit #2- Natural Gas fired

Emission Unit Size = 20.9 mmBtu/hr
Heating Value of Natural Gas = 1000 Btu/scf
Fuel Throughput = 167,000,000 scf
Hourly Throughput = (20.9 mmBtu/hr)/(0.001 mmBtu/scf) = 20,900 scf/hr = 0.021 mmscf/hr

Emission Factors from AP42 (Natural Gas Combustion, 7/98) for natural gas.

SO_2 0.6 lb/mmscf
PM_{10} 7.6 lb/mmscf

SO_2 emissions:
(0.6 lb/mmscf) x (0.021 mmscf/hr) = ***0.013 lb/hr SO_2***
Title V permitted rate = ***12.7 lb/hr SO_2***

(0.6 lb/mmscf) x (167 mmscf/yr) / (2000 lb/ton) = ***0.05 tons/yr SO_2***
Title V permitted rate = ***30.2 tons/yr SO_2***

(0.013 lb/hr SO_2) / (20.9 mmBtu/hr) = ***0.0006 lb/mmBtu***
Title V permitted rate = ***0.6 lb/mmBtu***

PM_{10} emissions:
(7.6 lb/mmscf) x (0.021 mmscf/hr) = ***0.16 lb/hr PM***
Title V permitted rate = ***0.5 lb/hr PM***

(7.6 lb/mmscf)x (167 mmscf/yr) / (2000 lb/ton) = ***0.63 ton/yr PM combined***
Title V permitted rate = ***0.8 ton/yr PM combined***

(0.16 lb/hr PM) / (20.9 mmBtu/hr) = ***0.007 lb/mmBtu***
Title V permitted rate = ***0.02 lb/mmBtu***

This demonstrates that if 167 million cubic feet of natural gas is burned they cannot exceed their emission limits. A calculation has been added to the permit allowing the facility to burn a mixture of the two fuels (based on BTU rating of boilers and the fuels) and still maintain emissions below what is listed in the permit. This will allow more operating flexibility for the source.

C. Recordkeeping and Reporting

The facility is required to keep records of their fuel throughputs to prove that they are not exceeding both the throughput limits and the emission limits. They must also keep records of the visible emission evaluations that they do.

D. Testing

Generic boilerplate testing conditions have been included for the boilers.

VI. GENERATOR OPERATION REQUIREMENTS - (Units #4, #98, and #99)

A. Limitations

The following federal regulation is applicable to the generators at this facility:

40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5 Chapter 20	General Provisions
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 80	Permits for Stationary Sources

The following minor NSR conditions from the permit issued 6/26/02, are applicable requirements for the Title V permit:

Condition 5: Hours of Operation
Condition 6: Fuel Requirements
Condition 7: Fuel Specifications
Condition 9: Emission Limits
Condition 10: Visible Emission Limits
Condition 8: Monitoring - Fuel Certification
Condition 11: Recordkeeping

A visible emission limitation has been pulled into the permit so the generators will comply with 9 VAC 5 Chapter 50 visible emission limits.

There are 3 generators at this facility. They are all listed as emergency generators and each is rated over 500 HP. They were installed before the applicability date of NSPS IIII, so none of the generators are applicable to NSPS IIII. Because these generators were installed in 2002 and prior, they are considered existing generators under MACT ZZZZ, therefore, there are no specific work practice requirements for them, the MACT only defines how they must operate to qualify as emergency generators (See 40 CFR 63.6640(f)(2)).

B. Monitoring

The monitoring requirements from the underlying NSR permit dated 6/26/02 have been pulled into the permit and applied to all the generators. Visible emission monitoring has also been added to this section.

C. Recordkeeping

The permit includes recordkeeping requirements from the NSR permit dated 6/26/ and the recordkeeping requirements for the additional monitoring required.

D. Streamlined Requirements

63.6640 (f)(2)(a)
"There is no time limit on the use of emergency stationary RICE in emergency situations." The source has a state requirement to limit hours of emergency operation to 500 hours (9 VAC 5-80-1320B.2.), so this has been streamlined out to remove the conflict between these two requirements.

VII. Dry Dock Abrasive Blasting and Painting Operations (Units #10, #21, #22, #23 and #28)

A. Limitations

The following federal regulation is applicable to the abrasive blasting and painting operations at this facility:

40 CFR 63, Subpart II-National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5 Chapter 20	General Provisions
9 VAC 5 Chapter 50	New and Modified Stationary Sources
9 VAC 5 Chapter 80	Permits for Stationary Sources

There is no underlying permit for the blasting operations on the dry dock. The facility signed a Memorandum of Understanding with the Department in 1990 and these conditions have been pulled into the title V permit. The coating operations are subject to the Shipyard MACT (Subpart II) and those requirements were listed in the underlying minor NSR permit dated 6/26/02. These conditions along with an emissions limit condition have been pulled into the Title V permit:

Condition 23: Compliant coatings
Condition 24: General Provisions (using Table I)
Condition 25: Low usage exemption
Condition 26: SSM
Condition 27: VOHAPs (using Table II)
Condition 28: VOC handling
Condition 29: Emission limits

There is no visible emission limit because this operation generates fugitive emissions, which cannot be regulated by an opacity limit.

B. Monitoring

Monitoring of the abrasive blasting operations will be accomplished by checking for and not allowing fugitive particulate matter to cross any property line. The monitoring for the painting operations are pulled from the ship repair MACT and from the underlying minor NSR permit.

C. Recordkeeping and Reporting

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include the records required by the ship repair MACT and the quarterly visible emission checks from the painting and blasting operations.

VIII. DEGREASER OPERATION REQUIREMENTS - (Units #24, #25, and #27)

A. Limitations

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5 Chapter 20	General Provisions
9 VAC 5 Chapter 40, Article 24	Solvent Metal Cleaning Operations
9 VAC 5 Chapter 80	Permits for Stationary Sources

There are 3 solvent degreasers at this facility. 9 VAC 5 Chapter 40, Article 24 is applicable to all the degreasing units. Each of the units is a cold solvent degreaser. Specific operating limitations from 9 VAC 5 Chapter 40, Article 24 have been incorporated into the permit.

B. Monitoring

The monitoring requirements from 9 VAC 5 Chapter 40, Article 24 (labeling and inspections) have been pulled into the permit.

C. Recordkeeping

The permit includes recordkeeping requirements from 9 VAC 5 Chapter 40, Article 24 which include inspection results and waste disposal records.

IX. FACILITY WIDE CONDITIONS

This section of the permit has only the boilerplate testing requirements for the facility as a whole.

X. GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

1. Comments on General Conditions

   a. Condition B. Permit Expiration

   This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

   b. Condition F. Failure/Malfunction Reporting

   Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

c. Condition J. Permit Modification

This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits
9 VAC 5-80-260. Enforcement
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

d. Condition U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

e. Condition Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

XI. INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart Dc	Standards of Performance for small industrial-commercial-institutional generating units	Boilers installed prior to 6/9/1989
40 CFR 60 Subpart IIII	Standards of Performance for Reciprocating Internal Combustion Engines (RICE)	Generators were manufactured prior to the 2006 applicability date.

XII. INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9VAC5-80-720 C)
5	Caterpillar diesel compressor	9 VAC 5-80-720 B	PM10, PM, VOC, SO2, NOx, CO, HAPs	
6	Caterpillar diesel compressor	9 VAC 5-80-720 B	PM10, PM, VOC, SO2, NOx, CO, HAPs	
11	Enclosed bead blaster in outside machine shop	9 VAC 5-80-720 B	PM10	
12	Enclosed bead blaster in boiler shop	9 VAC 5-80-720 B	PM10	
13	Enclosed bead blaster in compressor / fire pump maintenance area	9 VAC 5-80-720 B	PM10	
14	Enclosed bead blaster in inside machine shop	9 VAC 5-80-720 B	PM10	
15	Enclosed bead blaster in electric shop	9 VAC 5-80-720 B	PM10	
16	Air conditioner maintenance	9 VAC 5-80-720 B	VOC	
29	Detroit Diesel 253 emergency generator	9 VAC 5-80-720 C		55 HP
31	Wet Slip Detroit diesel 671 fire pump	9 VAC 5-80-720 C		235 HP
32	Finger pier Cummins Diesel 903 fire pump	9 VAC 5-80-720 C		240 HP
66	Electroplating in electric shop	9 VAC 5-80-720 B	PM10, inorganic HAPs	
68	Woodworking operations in carpenter shop	9 VAC 5-80-720 B	PM10	
69	Paint Mixing in paint shop	9 VAC 5-80-720 B	VOCs, VOHAPs	
71	Maintenance shop touch-up painting (90% hand-applied; 10% airless spray)	9 VAC 5-80-720 B	VOCs, VOHAPs	
72	Covered Metro 88 degreasers (2) in tool room (contains no solvents)	9 VAC 5-80-720 B	None	
73	Spray can degreasers, cleaners, etc. in maintenance shop	9 VAC 5-80-720 B	VOCs, VOHAPs	
74	Spray can degreasers, cleaners, etc. in outside machine shop	9 VAC 5-80-720 B	VOCs, VOHAPs	
75	Spray can degreasers, cleaners, etc. in boiler shop	9 VAC 5-80-720 B	VOCs, VOHAPs	
76	Spray can degreasers, cleaners, etc. in inside machine shop	9 VAC 5-80-720 B	VOCs, VOHAPs	
77	Spray can degreasers, cleaners, etc. in electric shop	9 VAC 5-80-720 A	VOCs, VOHAPs	Not Applicable

Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9VAC5-80-720 C)
81a	Waste oil storage tank in hazardous waste storage building next to OWTS #1	9 VAC 5-80-720 B	VOCs, VOHAPs	
81b	Waste oil storage tank located next to OWTS #1	9 VAC 5-80-720 B	VOCs, VOHAPs	
81c	Waste oil storage tank located next to OWTS#2	9 VAC 5-80-720 B	VOCs, VOHAPs	
82	Propane storage is on the south side of OWTS #2 and welding gas storage is on the north side of OWTS #2	9 VAC 5-80-720 B	VOCs	
83a	Underground gasoline storage tank near OWTS #2 and gasoline loading pumps	9 VAC 5-80-720 B	VOCs, VOHAPs	
83b	Underground diesel storage tank near OWTS #2 and diesel loading pumps	9 VAC 5-80-720 B	VOCs, VOHAPs	
89a	Underground #2 oil storage tank near boiler room	9 VAC 5-80-720 B	VOCs, VOHAPs	
89b	Underground #2 oil storage tank near boiler room	9 VAC 5-80-720 B	VOCs, VOHAPs	
93a	OWTS #1 - Oil/water separator and treatment system including processing tanks	9 VAC 5-80-720 B	VOCs, VOHAPs	
93b	OWTS #2 - Oil/water separator and treatment system including processing tanks	9 VAC 5-80-720 B	VOCs, VOHAPs	

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

XIII. PUBLIC PARTICIPATION

The proposed permit will be place on public notice in the Virginian Pilot from November XX, 2012 to December XX, 2012.